

## GENERAL COMMENTS

### **CACU - C: 1.4 Basis and Purpose of Consultation**

1.4.2 Stakeholder Engagement Sessions were held in addition to a Focus Group for PWDs. Which organizations, groups and citizens were these? Additionally, were groups such as the CACU, CAC, CDA, ECC, etc. invited to participate? If not, why not?

*Question 1: Do you agree with the proposal? Please justify your position and provide supporting information and references.*

**CACU - A:** I do not agree with the proposal. Persons with disabilities tend not to want to stand out through certification etc...in addition, someone who was fully able and through some accident such as a stroke, who then becomes disabled, may not want to be certified. It should be indicated in the document whether this is one of the proposals that came out of consultations with the relevant group/groups of persons with disabilities.

- The ability to pick the package/service that you want applies to everyone based on their circumstances, not their ability. In the digital age this is easily and readily accessible to all.

**CACU - P:** I agree that there may be instances when PWD may not want to stand out. However, it is important that the option for a dynamic suite of options should be available for them, but they must include those that are specifically designed for access by the disabled. It may take some education and sensitization to ensure early adaptation.

**CACU - G:** I agree with the proposal and the justification put forward by **CACU - P**.

**CACU - C:** I do not agree with the proposal. All customer classes do **not** have the option to select and only pay for the services they either want or use. While I support services particularly targeted for PWDs should be made available, I cannot agree that those packages should be so designed that this special group only pays for selected features.

*Question 2: Do you agree with the proposal? Please justify your position and provide supporting information and references.*

**CACU - A:** I do not fully agree with the proposal.

- We are in the information age so videos, manufacturers' specifications etc...can provide details before a purchase is made. We do not want to make it appear that someone with a disability cannot make an informed purchase.
- The proposal should refer to specific disabilities and not be general.
- The proposal indicates that PWDs have stated that costs can be prohibitive but that is an economic concern that extends to a number of persons in society.
- While the requirement may be imposed on the service providers I do not believe that it is practical to extend to third parties.
- The preamble should state very clearly that the device is being bought from the service provider.

**CACU - P:** I agree with some caveats because, It is difficult for the ABP (Able-bodied Persons) to fully understand the plight and challenges of disabled persons and we do have to cater to persons who are the least amongst us, be it financial constraints or otherwise.

- There should be specifics in the offerings be it based on hearing, visual impairment etc. We do not have to invent the wheel. The FCC in the US has various policies which include though not limited to Dispute Assistance for products not meeting Usability, Accessibility and Compatibility standard. The problem in Jamaica will be enforcement if failure for the requisite standards are not met.
- The policy requires more substance to it. I agree that it tends to be too general.

**CACU - G:** I do not fully agree with the proposal. Similar to CF I believe that videos and other means of communicating with PWD can be set up in store for them to assess whether the devices available would meet their needs. I also do not believe that this proposal should be imposed to businesses other than service providers.

**CACU - C:** Basic laws of demand/supply dictates (for the most part) the price/costs of goods and services. If the requirement is enforced - all devices must be embedded with or have preloaded access features and apps that support PWDs, then one should expect that there may be additional costs for these special features. Why persons without disabilities should be forced to subsidize the cost of these features, for which they have no need.

- I would support in-store testing for **all** customers and **not** have it available only for PWDs.
- While we would want to support general accessibility in ICTs for PWDs, I am afraid that enforcing such stringent measures may cause more harm than good for what we are trying to achieve.

**Question 3: Do you agree with the proposal? Please justify your position and provide supporting information and references.**

**CACU - A:** I counter-propose that a specialized service center be established under the Ministry of Labour and Social Security in collaboration with the Jamaica Council for Persons with Disabilities and supported by telecoms providers, one in each county, to provide these services.

In addition the majority of Jamaican mobile users are prepaid as evidenced by this statement regarding Digicel's customers: *Prepaid customers, those customers that pay for service in advance through the purchase of wireless airtime, represented approximately 93.7% of Digicel's subscribers at March 31, 2015. Prepaid customers do not sign fixed term service contracts* (<https://www.sec.gov/Archives/edgar/data/1645826/000119312515236163/d946689df1.htm>). So it may not be cost effective to invest in specialized billing.

**CACU - P:** I understand the concern expressed above. There are phones with large **fonts** that are available at reasonable prices and phones now with braille so those could be made available. I also understand the percentage of pre-paid customers, but the larger fonts would cater to a wide spectrum of the target audience.

They could research the availability of such technology. Maybe the geeks amongst us can tell us the challenge in making these configuration changes and if the cost outweighs the benefits. Technology may exist to make these changes without a cost.

**CACU - G:** I agree with the proposals. The service providers should engage the assistance of the JCPD in determining what format would be acceptable for persons with different disabilities. These options should be communicated to customers and potential customers who would indicate to the service provider the format they prefer.

**CACU-C:** There are too many unqualified assumptions and statements were stated in this consultative document. I would have thought that some qualified data and indicators would have been provided - at the least for Jamaica - in order to better understand the population and profile of the PWDs community - education levels, nature of the disabilities, income level, etc. - in order to make a reasonable and fair contribution to this consultation.

- Here again, basic principles of demand and supply would apply even in more developed/developed technologically-advanced territories/jurisdictions.
- In the absence of qualified indicators/data regarding PWD population/profile, I cannot agree that the “increased participation” in the market, benefits all stakeholders.

**Question 4: Do you agree with the proposal? Please justify your position and provide supporting information and references.**

**CACU - A:** This is practical and should be easy to implement and beneficial to persons with difficulty seeing or hearing.

**CACU - P:** I concur

**CACU - G:** I fully agree

**CACU - C:** I agree.

**Question 5: Do you agree with the proposal? Please justify your position and provide supporting information and references.**

**CACU - A:** This is practical. It falls under the proposal for Question 4.

**CACU - P:** I concur

**CACU - G:** I fully agree

**CACU - C:** In principle I agree however there are too many general assumptions made without proper baseline data to guide views, decision-making.

**Question 6: Do you agree with the proposal? Please justify your position and provide supporting information and references.**

**CACU - A:** I counter-propose that a specialized service center be established under the Ministry of Labour and Social Security in collaboration with the Jamaica Council for Persons with Disabilities and supported by telecoms providers, one in each county, to provide these services.

**CACU - P:** I concur from the perspective of a centralized place for these types of assistance. These are programs that may have to be subsidized by the State to ensure that all our citizens have access to these services. I know everybody is going to talk about cost - accountability is necessary. I know, I know.

**CACU - G:** I agree with the proposals except that they should be provided through a centralized facility in collaboration with the JCPD. I believe that it will be too costly to try to establish this service with all the service providers and also in store.

**CACU - C:** These services may already exist in principle, however the Combined Disabilities Association (CDA), JCPD are not properly resourced to undertake nor offer these services, due to limited a) financial resources and b) institutional technical capability.

*Question 7: Do you agree with the proposal? Please justify your position and provide supporting information and references.*

**CACU - A:** I counter-propose that a specialized service center be established under that Ministry of Labour and Social Security, one in each county, to provide these services. In addition, there is no information on the cost and effort for persons to get the required certification of disability by the designated entity(ies). If there are no other benefits to be accrued from registering, then persons may choose not to do it.

**CACU - P:** I think if the websites are disable enabled this will alleviate many issues. Many companies globally are moving away from verbal interface except as a last resort so PWD enables access should be researched. The MLSS will be manned during normal hours as such web access should be robust enough to cater to the PWDs.

**CACU - G:** I concur with CACU - P's response

**CACU - C:** Again, this could be deemed an unfair practice, as persons without disabilities who are not literate, would have the same issue - there is already a directory service - printed and verbal. Additionally, many persons without disabilities do not use the printed directories. The data suggests that persons with devices - mobile phones, laptops, desktops, tablets, etc. are more like to use web/online searches.

*Question 8: Do you agree with the proposal? Please justify your position and provide supporting information and references.*

**CACU - A:** There is a consultation for Enhanced Emergency Service Access under which this should be considered and does not need to be singled out for PWD's.

**CACU - P:** Fundamentally I am in concurrence. However, we will have to ensure that the PWDs have ease of access.

**CACU - G:** I am in agreement with the proposal.

**CACU - C:** In principle, I am in agreement except that this is not an issue faced by PWDs only. Again, persons who are unable to read and/or write would be in the same position.

*Question 9: Do you agree with the proposal? Please justify your position and provide supporting information and references.*

**CACU - A:** No. It is not practical. Anyone registering for service can put any email address to receive their bill. Most people are prepaid. Anyone can report a fault currently.

**CACU - P:** I agree with the proposal. This will streamline the process of two way notifications.

**CACU - G:** I agree with the proposal as it can greatly assist with addressing issues that may require urgent response using normal means of communication. PWDs will also have the option to nominate someone they trust to act on their behalf if needs be.

**CACU - C:** In principle, I support this approach except that without any data/indicators of the customer base and their billing preferences, this could approach could/may present security issues and thirty party resistance.

***Question 10: Do you agree with the proposal? Please justify your position and provide supporting information and references.***

**CACU - A:** No.

I counter-propose that a specialized service center be established under the Ministry of Labour and Social Security in collaboration with the Jamaica Council for Persons with Disabilities and supported by telecoms providers, one in each county, to provide these services. There would be no need for registration of disability.

**CACU - P:** I understand the concerns above, but many countries have this ability and include a number and the number is associated with the person and it is known from the number that the person is PWD. Those who chose not to register do not have to.

**CACU - G:** I agree with the proposal. I believe that persons who genuinely have disabilities and want to benefit from the PWD service should register to receive the service.

**CACU - C:** I agree somewhat - would strongly suggest that reliable data collection be done to determine the customer base (numbers of persons) for all the proposed accessibility services as ultimately, cost of service will be the determining factor.

***Question 11: Do you agree with the proposed implementation timelines? Please justify your position and provide supporting information and references.***

**CACU - A:** No. Most of the proposals are not practical or financially feasible.

**CACU - P:** I agree. The need to establish timelines are crucial to a successful implementation.

**CACU - G:** I agree that implementation timelines should be established. The actual timelines should be agreed on through discussions with the service providers.

**CACU - C:** I am not convinced that the general data presented on both the customer base and numbers, that one could reasonably expect these timelines be implemented for these requirements. Placing these kinds of demands in the absence of reliable data - PWDs in Jamaica, tourist arrivals and business visitors - could do more harm than good in making the business case.

***Question 12: Do you agree with the recommendations? Please justify your position and provide supporting information and references.***

**CACU - A:** No. Use funds to establish areas for the services that PWDs require, no registration. It must be apparent when someone comes in to access the service as it is expected that the workers there would be trained. (Recall this is being proposed as a requirement on the telecom service provider)

**CACU - P:** Registration is pivotal. This should be done in conjunction with a strong public educational campaign.

**CACU - G:** I agree with the recommendations however implementation of these cannot be the responsibility of the service providers. The Ministry of Labour and Social Security would have to be responsible for implementation of these recommendations.

**CACU - C:** I recommend that these requirements be deferred until the baseline data for PWDs in the country (resident/visitors) who use (or for that matter would use these services) is available and until there is a nationally defined, developed and secure certification system in place, the implementation of these proposed recommendations could be jeopardized by fraudulent activities and/or a less than capable JCPD and other organizations such as the CDA, which do not possess the capacity nor expertise to carry out these processes.

- Procurement processes and levels are not reflective of the size of the market and are distorted by financing sources.
- Additionally, Jamaica's telecom market size and structure is reflective of a large market? - by which or whose standards or measurements?

**Question 13: Do you agree with the recommendation? Please justify your position and provide supporting information and references.**

**CACU - A:** I abstain. The recommendation is too vague.

**CACU - P:** If my understanding of this is correct, I agree with the proposal that the Public Sector would be required to develop procurement policies to expand the utilization of ICT services and equipment. This may take some time for full implementation, but it would expand the range of access to all sectors of the society importantly, including the PWD.

**CACU-G:** I agree with the proposal. If GOJ adopts an inclusive public procurement policy in order to promote equivalence within ICT, service providers will be incentivize to stock accessible ICTs, given GOJ's significant procurement which amounted to about 30% of GDP in 2002 according to a World Bank report.

**CACU - C:** I cannot agree nor disagree as there is not enough information on which to comment. I would need to more information and a better understanding of what this recommendation is intended to achieve.

**Question 14: Do you agree with the recommendation? Please justify your position and provide supporting information and references.**

**CACU - A:** It is a vague recommendation. However the government is one such entity making ICT equipment/devices available so one expects that PWDs are considered.

**CACU - P:** This is a noble endeavour. The improvement in Public available ICT Equipment/Devices as a general policy should be implemented and recommendations made with specified timelines for compliance developed. It may be a tall order to dovetail both objectives of more public access and access for the PWD, but the attempt should be made with certain caveats.

**CACU - G:** I believe that any decision to make ICT publicly available should include accessibility to all, including PWDs. Since this may not be financially feasible for service providers, such endeavours may have to be undertaken by GOJ.

**CACU - C:** Current circumstances do not suggest that there is consideration for PWDs. Neither can inclusion of statements about accessibility needs **based on** international standards from regions abroad with more robust and modern legislative and procurement regimes, be enforced when local market conditions may not necessarily be conducive to conformity at this time. Jamaica's legislative agenda must be made clearer, more modern and developed to enact these kinds of policies, prior to any legislative and regulatory action.

*Question 15: Do you agree with the recommendation? Please justify your position and provide supporting information and references.*

**CACU - A:** No. Use the funds to support the JCPD to communicate with the persons that it supports and do a more targeted reach.

**CACU - P:** I agree with this policy as it will sensitize all cross-section of the society to the need for inclusion and allow for those ABP to assist in the education of the PWD generally. This will allow for a global acceptance of the plight of PWD.

**CACU - G:** I concur with **CACU - P**.

**CACU - C:** I would suggest that the funds be used to support a targeted public education programme which should include the input from the relevant organizations as mentioned before, the JCPD, CDA, etc. do not currently possess the skill set/funding to carry out these programmes.

*Question 16: Do you agree with the recommendation? Please justify your position and provide supporting information and references.*

**CACU - A:** No. Use the funds through the existing USF to enhance the requirements for PWDs where and as needed, or use the funds to establish specialized service centers under the Ministry of Labour and Social Security in collaboration with the Jamaica Council for Persons with Disabilities and supported by telecoms providers, one in each county, to provide these services.

**CACU - P:** I agree with the policy. If the funds are to be used to provide ICT Accessibility, it should be used for all public accessibility be it ABP or PWD.

**CACU - G:** I concur with **CACU - P**

**CACU - C:** The USF should be used to support all the accessibility needs of **all** users (including the PWD and ABP).